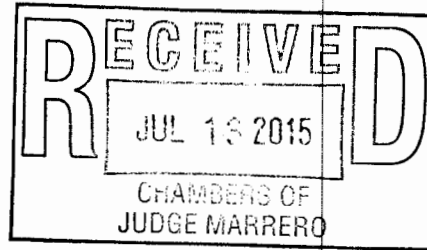


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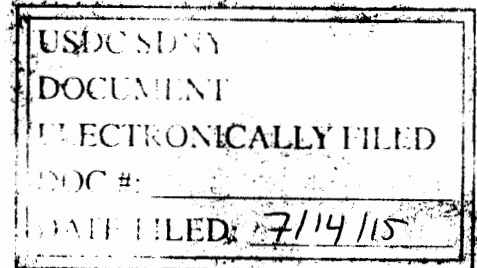
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大成律师事务所

July 13, 2015

VIA FACSIMILE ONLY (212) 805-6382

The Honorable Victor Marrero
U.S. District Court for the Southern District of New York
United States Courthouse, Suite 660
500 Pearl Street
New York, NY 10007



Re: Euro Pacific Capital Inc. et al. v.
Bohai Pharmaceuticals Group, Inc.
Case No. 1:15-cv-04410-VM

Dear Judge Marrero:

This firm is corporate counsel for the defendant in this matter, Bohai Pharmaceuticals Group, Inc. ("Bohai"), whose deadline to answer or otherwise respond to the plaintiffs' complaint is July 14, 2015 (Dkt. 6). Bohai respectfully requests a 30-day extension of time, to August 13, 2015, for it to answer, make an appropriate motion or otherwise respond to the complaint.

Our office has not entered an appearance for Bohai in this matter, and firstly, Bohai makes this request to allow it additional time to select defense counsel for this litigation. Secondly, Bohai makes this request to allow it further time to investigate the plaintiffs' claims and consult with defense counsel so that a meaningful response may be made to the complaint.

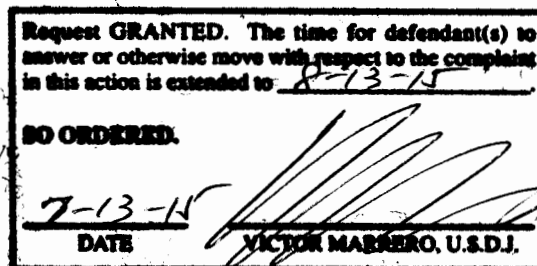
Earlier today, this office called plaintiffs' counsel's office on Bohai's behalf and left a message requesting their consent to this extension request. Understandably, plaintiffs' counsel has not yet responded to our request, and we write at this time so that Bohai's request is not made on the answer filing deadline. No prior request for an extension to respond to the plaintiffs' complaint has been made, and should the extension be granted, it is not anticipated that it will affect any other scheduled dates.

We ask that you please let us know if this extension request may be granted.

Respectfully submitted,

Kerry J. Kaltenbach (KK8045)
Admitted to USDC, SDNY

KJK/ny



The Hon. Victor Marrero

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July 13, 2015

cc: Christopher Lewis Ayers, Esq.
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